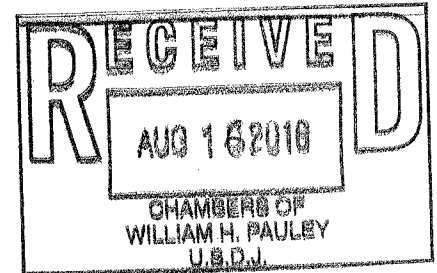


JOSEPH A. GROB, P.C.
345 SEVENTH AVENUE, 21ST FLOOR
NEW YORK, NEW YORK 10001
TEL.: (516) 993-7336
FAX: (866) 651-3196

August 15, 2016

BY HAND DELIVERY

Hon. William H. Pauley III
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007



Re: Securities and Exchange Commission v. Devon Archer, et. al.
16 Cr. 3505 (WHP)

Dear Judge Pauley:

I have been appointed to represent Hugh Dunkerley in the parallel criminal action, *United States v. Galanis*, 16 Cr. 371 (RA), filed by the United States Attorney's office for the Southern District of New York. Enclosed please find Mr. Dunkerley's letter motion seeking a complete stay of this case pending a resolution of the parallel criminal case. Mr. Dunkerley also joins in the similar motion submitted by pro se defendant Michelle Morton in this action. By the same letter, Mr. Dunkerley asks for permission to be excused from the upcoming conference which is scheduled to take place on August 18, 2016. I have also enclosed a courtesy copy of Mr. Dunkerley's answer that is being submitted for filing today as well.

I am providing Your Honor with these materials as an accommodation to Mr. Dunkerley, who I represent in the parallel criminal action only and who lives in California. I do not represent Mr. Dunkerley in this action and this letter should not be construed as an appearance on his behalf.

Respectfully submitted,

Joseph A. Grob

cc: Tejal D. Shah and Nancy Brown for the S.E.C. (By e-mail)
AUSA Brian Blais (By e-mail)
All defense counsel on the criminal action (By e-mail)
All defense counsel on the civil action (By e-mail)
Ms. Michelle Morton (By e-mail)